



October 12, 2017

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly, Commissioner Carr, Commissioner Rosenworcel, and Ms. Dortch,

On behalf of Houston Ballet Foundation, located in Houston, TX, that provides approximately 116 performances per year to 164,000 audience members and education programs to 60,000 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

We strongly support the Commission's proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. We support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

Professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while mitigating significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

Houston Ballet's Mission Statement reads: *"To inspire a lasting love and appreciation for dance through artistic excellence, exhilarating performances, innovative choreography and superb educational programs."* Being a ballet company, we have less of a need for large channel counts, but wireless microphones and communication devices are still essential to our productions. We use wireless microphones for panel discussions to educate our audiences, for safety announcements to protect them, and for live musicians to enhance our productions. Wireless communication devices are used to connect our backstage crew, enabling them to function safely and seamlessly. Houston Ballet has an active, full year of many performances in which these wireless microphones and coms are used. Performances occur in multiple venues, both indoors

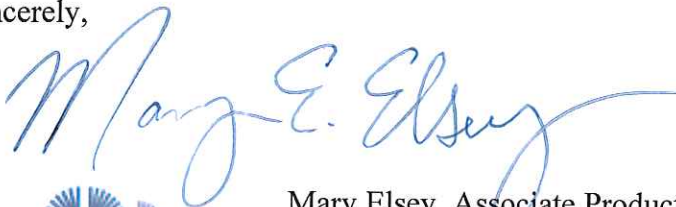
and out, at different times. Technical guidance and frequency coordination is performed by qualified professionals both in IATSE local 51 and by rental houses like Audiovend/Greg Stevens. Since the season is planned in advance, Houston Ballet has the ability to log frequencies and register for protection for those times only.

I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

Performing arts organizations across the country provide an irreplaceable and important service to their communities. Through performance and ancillary programming they seek to educate, enlighten, entertain, and provide a platform for discussion and debate. I appreciate that the Commission has sought Public comment on the proposal to expand Part 74 LPAS rule to accommodate the needs of these important institutions. Many of these institutions, including Houston Ballet, already bore a burden when asked to vacate the 700 MHz band. The cost of once again replacing such vital sound equipment without the assurance that the system will work properly and without interference for an extended amount of time is concerning.

Sincerely,



HoustonBallet

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